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February 18, 2008

VIA ECF

The Honorable Solomon Oliver, Jr.
United States District Court Judge
Carl B. Stokes United States Court House
801 West Superior Avenue
Cleveland, Ohio 44113-1838

Re: *Joanne Siegel, et al. v. Warner Bros. Entertainment, Inc.*
U.S. District Court for the Northern District of Ohio, Case No. 1:06-MC-99

Dear Judge Oliver:

I am writing to clarify which counsel and party will be asserting the attorney-client privilege and filing documents responsive to Your Honor's Order of February 6, 2008. That Order required Don Bulson to submit a revised privilege log, produce the documents on that log to the Court, and appear for deposition. Marc Toberoff, counsel in the underlying action for Joanne Siegel and Laura Siegel, will make all required filings on behalf of the estate of Michael Siegel—not Mr. Bulson.

Mr. Bulson and his firm represented Michael Siegel, now deceased, but do not represent any party involved in the underlying litigation and no longer possess the original documents at issue. After Michael Siegel's passing, the administrator for Mr. Siegel's estate, Melvin Banckek, instructed Mr. Bulson to communicate with Marc Toberoff regarding the instant subpoena. Accordingly, Mr. Bulson understands that any attorney-client privilege is not his to assert. Instead, Mr. Toberoff is asserting the attorney-client privilege on behalf of Michael Siegel's estate and Laura Siegel as his sole heir and successor.

Mr. Bulson's sole goal in this matter is to comply with the Court's Order in every respect. Thus, Mr. Bulson will take *no position* regarding privilege over these documents or his deposition testimony but will honor Ms. Siegel's and/or Mr. Banckek's assertions of attorney-client privilege unless instructed by the Court to do otherwise. To that end, Mr. Toberoff and his firm will be solely responsible for drafting and filing any revised privilege log and the production of documents. Mr. Bulson, of course, will make himself available for deposition in accord with Your Honor's Order.

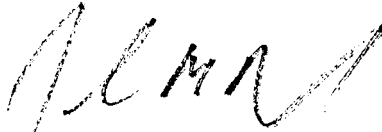
The Honorable Solomon Oliver, Jr.

Case No. 1:06-MC-99

February 18, 2008

Should Your Honor require any additional clarification or wish to address this matter further, Mr. Bulson will cooperate in any way requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JMR', with a stylized flourish at the end.

Joshua M. Ryland
Counsel for Don Bulson